

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:)

James E. Allen v. UniFirst Corp., et al.,)
No. 1:15-cv-10280-RWZ (D. Mass.))

Timothy B. Griggs, et al. v. UniFirst Corp.,)
et al., No. 1:14-cv-14668-RWZ (D. Mass.))

George Moore, et al. v. UniFirst Corp.,)
et al., No. 1:14-cv-13027-RWZ (D. Mass.))

**JOINDER OF ANONYMOUS HEALTH CARE PROVIDERS 2, 3, 6, 7 AND 8
IN THE SAINT THOMAS ENTITIES' RESPONSE TO THE PSC'S
MOTION TO QUASH SUBPOENA TO DR. PHILLIP J. AUSTIN, PH.D.**

Defendants Anonymous Health Care Providers 2, 3, 6, 7, and 8 in *Griggs, et al. v. UniFirst Corp., et al.* and *Allen v. UniFirst Corp., et al.*, and Anonymous Health Care Providers 1, 2, 3, and 5 in *Moore, et al. v. UniFirst Corp., et al.*, No. 1:14-cv-13027-RWZ (collectively "Anonymous Health Care Providers"),¹ hereby join in and adopt the briefing filed by the Saint Thomas Entities² in opposition to the motion to quash filed by the PSC [Dkt. # 2100]. For the

¹ As explained in the *Moore* Complaint, Plaintiffs have identified the undersigned defendants by pseudonym in compliance with the Indiana Medical Malpractice Act, Ind. Code § 34-18-1-1, *et seq.* See No. 1:14-cv-13027-RWZ, *Moore* Compl. ¶ 9 (Dkt. No. 1). In the *Allen* and *Griggs* cases, the undersigned defendants are identified as Anonymous Health Care Providers 2, 3, 6, 7, and 8. In those cases, Anonymous Health Care Providers 1, 4, and 5 are represented by separate counsel. In the *Moore* case, the undersigned defendants are identified as Anonymous Health Care Providers 1, 2, 3, and 5. In that case, Anonymous Health Care Provider 4 is represented by separate counsel.

² Saint Thomas West Hospital, f/k/a St. Thomas Hospital, Saint Thomas Health and Saint Thomas Network.

same reasons stated therein, the Anonymous Health Care Providers ask this Court to compel Dr. Austin to produce the documents requested and submit to a deposition. They likewise ask that the Court deny the PSC's alternative request for a protective order.

Date: July 28, 2015

By their attorneys,

/s/ Sarah P. Kelly

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*Appearing *Pro Hac Vice*

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 28th day of July, 2015.

/s/ Sarah P. Kelly
Sarah P. Kelly

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